

CLEARY GOTTlieb STEEN & HAMILTON LLP

NEW YORK
PARIS
BRUSSELS
LONDON
FRANKFURT
COLOGNE
MOSCOW

2112 Pennsylvania Avenue, NW
Washington, DC 20037-3229
T: +1 202 974 1500
F: +1 202 974 1999
clearygottlieb.com


D: +1 202 974 1959
lmalm@cgsh.com

ROME
MILAN
HONG KONG
BEIJING
BUENOS AIRES
SÃO PAULO
ABU DHABI
SEOUL

January 18, 2022

VIA ECF

Hon. Vernon S. Broderick
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 01/19/2022

Re: *In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig.*, MDL No. 2542;
Unopposed Letter Motion to Modify Sealing Deadlines

Dear Judge Broderick:

I write to update the Court regarding progress on sealing procedures for the Class Certification Reply, *Daubert* briefing, and summary judgment briefing. See ECF Nos. 1436, 1437, 1583.

In light of the volume of material in the record to be worked through and the number of third parties implicated, Keurig requests that the deadline for parties and third parties to request sealing be reset to March 4, 2022, with the following deadline to refile briefs and exhibits accordingly reset to March 18, 2022. Keurig believes both the parties and third parties will benefit from additional time to work through the record to develop and refine their sealing requests, and such an extension will avoid the possibility of the Court being inundated with *ad hoc* requests for extensions by third parties.

We have conferred with the Plaintiffs, who do not oppose this request. Should the Court approve the request, the parties will notify the implicated third parties. (Should the court grant the above request, the parties would meet and confer with Unilever, as instructed by the Court at ECF No. 1684, by March 4, 2022 as well.)

As before, this request would not affect the parties' pending requests to seal portions of the Motion for Class Certification, the opposition to the Motion for Class Certification, or *Daubert* briefing relating to experts opining on class certification. See, e.g., ECF Nos. 1358, 1411, 1416.

All of the procedures above would be without prejudice to any party's rights otherwise.

Hon. Vernon S. Broderick
January 18, 2022

Respectfully submitted,

/s/ Carl Lawrence Malm

Carl Lawrence Malm

*Counsel for Defendant
Keurig Green Mountain, Inc.*

cc: All Counsel of Record (via ECF)